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June 5, 1996

Mr. Neal Evans, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE: Identification No.: C00114447  
Reference: April Quarterly Report (1/1/96 - 3/31/96)

Dear Mr. Evans:

This letter is in response to your letter of May 24, 1996 regarding a transfer to an affiliated PAC listed on Line 23 of the report. As I indicated in our conversation today, it is our belief that the Tennessee Bankers Association Federal Political Action Committee is affiliated with the ACB COMPAC. This results from the fact that the Tennessee Bankers Association merged with the Tennessee League of Savings Institutions several years ago. America's Community Bankers is the federal trade association which represents these former League members.

While the Tennessee Bankers Association represents both commercial banks and savings institutions in the State of Tennessee and therefore has an affiliation both with the American Bankers Association and America's Community Bankers, this is not true in most other states. A few states have similar joint arrangements, however, most states have separate organizations for the two different entities. This also should not create an implication that the American Bankers Association and America's Community Bankers are affiliated at the federal level. A separate analysis under the Commission's criteria for affiliation would have to be performed to determine any other affiliate status.

Please feel free to call me if you need any additional information or assistance.

Sincerely,

Timothy L. Amos  
Vice President and General Counsel

cc: Mr. Ed Loughry, Cavalry Banking, Murfreesboro



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

RQ-5

Ed C. Loughry Jr., Treasurer  
Tennessee Bankers Association  
Federal Political Action Committee  
201 Venture Circle  
Nashville, TN 37228

Identification Number: C00114447

Reference: April Quarterly Report (1/1/96-3/31/96)

Dear Mr. Loughry:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to non-affiliated federal committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil Evans  
Reports Analyst  
Reports Analysis Division

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**Federal Election Commission**  
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